

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re: Chapter 11
WISCONSIN & MILWAUKEE HOTEL, LLC, Case No. 24-21743
Debtor. Honorable G. Michael Halfenger

**STIPULATION REGARDING DEBTOR'S OBJECTION TO CLAIM
OF COMPUTERSHARE TRUST COMPANY, N.A.**

Computershare Trust Company, N.A. ("Lender"), and debtor Wisconsin & Milwaukee Hotel, LLC ("Debtor"), submit this stipulation regarding Debtor's *Objection to Claim and Notice of Opportunity for Hearing* (ECF #377) (the "Claim Objection"), filed in response to Lender's Claim No. 11 (the "Claim"), and request entry of the proposed order submitted herewith.

RECITALS

A. The Claim Objection includes multiple objections to the Claim, itemized by Debtor as follows, with objection numbers used for ease of reference:

	CTC Claim 11	Debtor's Response	Objection #
Note A Principal	\$35,727,593.94	\$35,676,042.06 per CTC accounting to Debtor	1
Note A Late Payment Fee	\$1,782,988.37	Not permitted	2
Note B Principal	\$2,447,428.81	\$2,444,942.01 per CTC accounting to Debtor	3
Note B Late Payment Fee	\$122,195.21	Not permitted	4
Note C Principal	\$8,113,380.49	\$8,105,136.57 per CTC accounting to Debtor	5
Note C Late Payment Fee	\$405,084.81	Not permitted	6
Trustee Fees	\$7,500	Amount not substantiated	7

B. Lender and Debtor wish to resolve Objection Nos. 1, 3, 5, and 7 (collectively, the "Accounting Objections") without further delay or litigation expense.

C. Lender and Debtor wish to brief the legal issues presented by Objection Nos. 2, 4, and 6 (collectively, the "Late Fee Objections") pursuant to a mutually agreeable briefing schedule.

D. Lender and Debtor wish to adjourn resolution of Debtor's objection to the secured amount of Lender's Claim (*see* Claim Objection, ¶¶ 6-8) to the confirmation hearing in this case.

STIPULATION

In consideration of the foregoing recitals, Lender and Debtor hereby stipulate and agree as follows, and the Court may enter the proposed order submitted herewith:

1. All of the Accounting Objections are fully and finally resolved by reducing the Claim by the amount of \$35,000 in the aggregate.

2. The parties shall brief the Late Fee Objections in accordance with the following schedule: Debtor's brief in support due April 4, 2025; Lender's brief in opposition due April 18, 2025; any reply from Debtor due April 25, 2025.

3. Debtor's objection to the secured amount of Lender's Claim (*see* Claim Objection, ¶¶ 6-8) shall be adjourned to and adjudicated at the confirmation hearing in this case.

DATED: March 6, 2025

COMPUTERSHARE TRUST CO., N.A.

BY: /s/ Frank W. DiCastri

Frank W. DiCastri

REINHART BOERNER VAN DEUREN s.c.
1000 North Water Street, Suite 1700
Milwaukee, WI 53202-3186
414-298-1000
fdicastri@reinhartlaw.com

WISCONSIN & MILWAUKEE HOTEL, LLC

BY: /s/ Claire Ann Richman

Claire Ann Richman

RICHMAN & RICHMAN LLC
122 W. Washington Ave. Suite 850
Madison, WI 53703
(608) 630-8992
crichman@randrlaw.com